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**From:** Echeverria, Marietta [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=36C56B7169144626BD6AADEA25992D4E-MARIETTA ECHEVERRIA]  
**Sent:** 4/7/2021 6:19:08 PM  
**To:** Vogel, Dana [Vogel.Dana@epa.gov]; Wilbur, Donald [Wilbur.Donald@epa.gov]; Akerman, Gregory [Akerman.Gregory@epa.gov]  
**Subject:** FW: Active Ingredients meeting the OPPT PFAS Definition

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**From:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Sent:** Wednesday, April 7, 2021 9:44 AM  
**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Subject:** RE: Active Ingredients meeting the OPPT PFAS Definition

Our working definition utilized the May 4, 2018 OECD document *"Toward A New Comprehensive Global Database Of Per- And Polyfluoroalkyl Substances (PFASs): Summary Report On Updating The OECD 2007 List Of Per- And Polyfluoroalkyl Substances (PFASs)."*

Specifically that document identified PFAS as substances that contain a perfluoroalkyl moiety with three or more carbons (i.e.  $-C_nF_{2n}-$ ,  $n \geq 3$ ) or a perfluoroalkylether moiety with two or more carbons (i.e.  $-C_nF_{2n}OC_mF_{2m}-$ ,  $n$  and  $m \geq 1$ ).

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**From:** Aubee, Catherine  
**Sent:** Wednesday, April 07, 2021 9:26 AM  
**To:** Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)>  
**Cc:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>  
**Subject:** Re: Active Ingredients meeting the OPPT PFAS Definition

Thanks, Kerry. I think we need to be able to explicitly explain how our previous working definition for pesticides differs from the OPPT filter. I know we had numerous inquiries on broflanilide and after review it was determined that, despite having fluoridated moieties, this structure was not consistent with regulated PFAS such as PFOS and PFOA.

Best,  
Catherine  
Associate Director  
OPP Registration Division  
US Environmental Protection Agency

On Apr 7, 2021, at 9:11 AM, Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)> wrote:

Hi Marietta, Catherine, and Dan,

I worked with Tony Williams of EPA's Center for Computational Toxicology and Exposure to do a substructure search of all the pesticide active ingredients as listed in OPPIN against the OPPT working definition of PFAS.

Here are the results. I am pretty sure that the first four entries on this have no active registrations (I am in the process of confirming that), but I think you will definitely recognize the last two on the list as they are recently approved ai's

1,2-Dichloro-1,1,2,2-tetrafluoroethane  
Lithium perfluorooctanesulfonate  
N-Ethylperfluorooctanesulfonamide  
Flubendiamide  
Pyrifluquinazon  
Broflanilide

We also did a similar search of active ingredients using the draft OECD PFAS definition. As expected, the list of active ingredients that meet the draft OECD definition is more extensive (around 180 ai's). I will be going through that list in more detail to see if they are in actual use.

Kerry

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